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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND
INTERFERENCES

Inventor(s): James O. Schreckengast et al.

Confirmation No: 3204

Application No: 09/919,153

Examiner: John B. Walsh

Filing Date: July 31, 2001

Group Art Unit: 2151

SUBJECT: PROPRIETARY INFORMATION UTILITY

APPEAL BRIEF UNDER 37 C.F.R. § 41.37

Mail Stop Appeal Brief – Patents

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Dear Sir/Madam:

This Appeal Brief is presented in support of the Notice of Appeal filed on July 6, 2006, from the Final Rejection mailed March 6, 2006 rejecting claims 1-27 of the above-identified application.

The U.S. Patent and Trademark Office is hereby authorized to charge **Deposit Account No. 08-2025** in the amount of **\$500.00** for the filing fee for an Appeal Brief.

A petition for a one month extension of time is hereby requested. A request is made to charge **Deposit Account No. 08-2025** in the amount of **\$120.00** for the one month extension of time. At any time during the pendency of this application, please charge any fees required or credit any overpayment to Deposit Account 08-2025 pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees required under 37 C.F.R. 1.16, 1.17, 1.19, 1.20, and 1.21 to Deposit Account 08-2025.

Appellant respectfully requests reversal of the Examiner's rejection of pending claims 1-27.

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02 FC:1251 120.00 DA

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Docket No.: 10004047-1

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CONCLUSION

It is respectfully requested that the Board reverse the final rejections of claims 1-27 under both 35 U.S.C. § 101 and 35 U.S.C. § 102(b).

Respectfully submitted,

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CERTIFICATE UNDER 37 C.F.R. 1.8:

The undersigned hereby certifies that this paper or papers, as described herein, are being deposited in the United States Postal Service, as first class mail, in an envelope address to: Mail Stop Appeal Brief – Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on this 23 day of October, 2006.

By *Eileen A. Lehmann*
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REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, LP having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

RELATED APPEALS AND INTERFERENCES

Appellant submits that there are no related appeals or interferences which will directly affect or be directly affected by or have a bearing on the decision in the pending appeal.

STATUS OF CLAIMS

Claims 1-27 are pending in the application (see Claims Appendix), and are the subject of the present Appeal. Claims 28-31 were previously cancelled.

Claims 1-27 are rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter.

Claims 1-27 are rejected under 35 U.S.C. § 102(b) as being anticipated by Amazon.com.

STATUS OF AMENDMENTS

No amendments have been entered subsequent to the Final Rejection mailed March 6, 2006. The claims listed in the Claims Appendix, therefore, reflect the claims as of March 6, 2006.

SUMMARY OF THE CLAIMED SUBJECT MATTER

One aspect of the present invention, as claimed in independent claim 1, provides a proprietary information utility computing system which comprises an interface that provides outside entities connection to the proprietary information utility computing system. For example, Figure 2 shows an embodiment of a proprietary information utility 11 including an interface exchange system 21. The functionality of interface exchange system 21 is described illustratively in the Specification at page 11, lines 15 through 23. Within the description of

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interface exchange system 21 in the Specification, well known communications technology, such as cellular phones, wireless networks and internet sites, are referenced as illustrative examples.

The computing system further comprises a repository that contains proprietary information, wherein the repository is compartmentalized by user identity and entitlement, so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information. (See illustrative discussion of the embodiment of Figure 2 at page 9, lines 2-12 of Applicants' Specification describing the compartmentalized proprietary information library 27.)

The proprietary information computing system further comprises application services through which an entitled user accesses proprietary information to which he or she is entitled (See for examples, Running Application Services 28, 29 and 30 of Figure 2 and page 9, lines 22-24 of Applicants Specification for illustrative examples. See also page 11, line 24 to page 12, line 5 of Applicants' Specification and 25 of Figure 2 for illustrative discussion.) Additionally, the computing system comprises a security system, that limits access of each user connecting to the proprietary information utility computing system to proprietary information to which each user is entitled (See 22 Figure 2, and page 9, line 13-24 for an illustrative example.) Furthermore, the system comprises a billing system for tracking usage by users of the proprietary information utility computing system for billing purposes (See 23 of Figure 2 and page 8, line 23 to page 9, line 1 and page 16, lines 17-22 for illustrative examples).

One aspect of the present invention, as claimed in independent claim 19, provides a method implemented by a computing system, the method comprising providing outside entities connection to a proprietary information utility (See 21 of Figure 2 and Specification at page 11, lines 15 through 23 for illustrative description) and storing proprietary information within a repository, wherein the repository is compartmentalized by user identity and entitlement so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use

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particular proprietary information within the second category of proprietary information (See illustrative discussion of the embodiment of Figure 2 at page 9, lines 2-12 of Applicants' Specification describing the compartmentalized proprietary information library 27.)

The method further comprises limiting access of each user connecting to the proprietary information utility to proprietary information to which each user is entitled, the proprietary information to which each user is entitled being accessed through use of application services operating within the proprietary information utility, wherein multiple users can be granted access to the same proprietary information (See 22 Figure 2, and page 9, line 13-24 for an illustrative example.) Additionally, the method comprises tracking usage of users of the proprietary information utility for billing purposes. (See 23 of Figure 2 and page 8, line 23 to page 9, line 1 and page 16, lines 17-22 for illustrative examples).

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

Appellant seeks review of the rejection of claims 1-27 under 35 U.S.C. § 101 as being directed to non-statutory subject matter.

Appellant seeks review of the rejection of claims 1-27 under 35 U.S.C. § 102(b) as being anticipated by Amazon.com.

ARGUMENT**Rejection of Claims 1-27 Under 35 U.S.C. § 101**

In the Final Office Action of March 6, 2001, the Examiner states that the language of the claim raises a question as to whether the claim is directed to merely an abstract idea that is not tied to a technological art, environment or machine which would result in a practical application producing a concrete, useful and tangible result to form the basis of statutory subject matter under 35 U.S.C. 101.

An invention does not need to satisfy a technological arts requirement in order to be statutory subject matter. *Ex parte Lungren*, Appeal No. 2003-2088 (Bd. Pat. App. & Inter. 2005).

The Examiner goes on to state: "All of the elements and features of the claim can be implemented in software alone, thus it does not provide for tangible subject matter."

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Applicants respectfully disagree that this is a test for tangible subject matter. In any event, a proprietary information utility computing system is claimed as a machine (e.g., comprises systems such as an interface exchange system, a security system and a billing system functioning within the computing system) and hence falls within one of the statutory classes of inventions under 35 U.S.C. § 101.

As described in Applicants' Specification, the claimed invention produces several examples of final results that are useful, concrete, and tangible. Furthermore, the invention as claimed in claim 1 and the invention as claimed in claim 19 are directed to subject matter which achieves final results that are "useful, tangible and concrete." (*Interim Guidelines for Examination of Patent Applications for Patent Subject Matter Eligibility* – OG Date: 22 November 2005 I.C.2.b. Practical Application That Produces a Useful, Concrete, and Tangible Result. The proprietary information utility computing system is providing a real world result of allowing a user access to proprietary information in a repository based on the user's entitlement to the information. Real world systems form part of this computing system such as an interface that provides outside entities connection to the proprietary information utility computing system, a security system limiting access to a user to proprietary information based on the user's entitlement to access that information via application services, and of course a billing system for tracking usage by users of the proprietary information utility computing system for the real world result of billing.

Similarly, the method of claim 19 implemented by a computer system (a machine) is directed to a useful, concrete and tangible results of limiting access of each user connecting to the proprietary information to which each user is entitled, and the very real world task of tracking usage of users of the proprietary information utility for billing purposes.

It is respectfully requested that the Board reverse the 35 U.S.C. § 101 Final Rejection.

Rejection of claims 1-27 under 35 U.S.C. § 102(b) as being anticipated by Amazon.com.

The criteria for a rejection under 35 U.S.C. § 102 has been clearly defined by the courts and confirmed by the U.S. Patent and Trademark Office. "A claim is anticipated only

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if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Each and every element set forth in the claims is not found either expressly or inherently in Amazon. Based on this, Applicant is traversing the rejections of the claims.

The Examiner did provide an archived 1999 webpage from Amazon.com <http://web.archive.org/web/19991013091817/http://amazon.com/>. However, no citations were made to this document and Amazon.com was simply referenced.

Below, Applicant points out subject matter within each independent claim that is not disclosed by Amazon. On the basis of this, Applicant believes all the claims are patentable over Amazon.

Discussion of Independent Claim 1

Claim 1 sets out a proprietary information utility computing system. The proprietary information utility computing system includes a repository that contains proprietary information. The repository is compartmentalized by user identity and entitlement, so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information. This is not disclosed or suggested by Amazon.

Examiner has asserted that the second category of proprietary information is the same as public data available on amazon.com home page. This is incorrect. Specifically, claim 1 sets out that the second category is proprietary information that is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information.

Applicant notes that the "public" information disclosed by Amazon is not proprietary information and is not within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information.

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Applicant notes that claim 1 sets out that the proprietary information utility computing system includes application services. Examiner has not suggested any equivalent within Amazon for the application services set out in claim 1.

Furthermore, the billing system of claim 1 is “for tracking usage by users of the proprietary information utility computing system for billing purposes.” At the bottom of page 3 to the top of page 4, the Examiner cites as support for the billing system “billing system for purchasing products/services from website.” The referenced page shows only books, DVDs, auction tangible items such as Presidential letters, costumes and other products for sale. There are no services offered in the reference that appear to track usage by users of the proprietary information utility computing system for billing purposes. A user is billed for products purchased, not usage of Amazon.com.

Claims 2-18 depend from claim 1 and the arguments with respect to claim 1 apply to them as well.

Discussion of Independent Claim 19

Claim 19 sets out a method implemented by a computing system. Proprietary information is stored within a repository. The repository is compartmentalized by user identity and entitlement, so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information. This is not disclosed or suggested by Amazon.

Examiner has asserted that the second category of proprietary information is the same as public data available on amazon.com home page. This is incorrect. Specifically, claim 19 sets out that the second category is proprietary information that is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information.

Applicant notes that the “public” information disclosed by Amazon is not proprietary information and is not within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information.

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Applicant notes that claim 19 also sets out that the proprietary information to which each user is entitled is accessed through use of application services operating within the proprietary information utility. Examiner has not suggested any equivalent within Amazon for the application services set out in claim 19.

Furthermore, there is no support for “tracking usage of users of the proprietary information utility for billing purposes.” As discussed above with respect to claim 1, it appears the user is billed for items purchase, not usage of Amazon.com itself.

Claims 20-27 depend from claim 19 and the arguments with respect to claim 19 apply to them as well.

It is respectfully requested that the Board reverse the 35 U.S.C. § 102(b) Final Rejection.

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CLAIMS APPENDIX

1. A proprietary information utility computing system comprising:

an interface that provides outside entities connection to the proprietary information utility computing system;

a repository that contains proprietary information, wherein the repository is compartmentalized by user identity and entitlement, so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information;

application services;

a security system, that limits access of each user connecting to the proprietary information utility computing system to proprietary information to which each user is entitled, the proprietary information to which each user is entitled being accessed through use of the application services; and

a billing system for tracking usage by users of the proprietary information utility computing system for billing purposes.

2. A proprietary information utility computing system as in claim 1 wherein the second category of proprietary information includes decision support software.

3. A proprietary information utility computing system as in claim 1 wherein the application services include services to perform at least one of the following activities related to patents:

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help identify patentable ideas;

create patent disclosures;

manage pending patents;

manage research logs; and,

research existing patents.

4. A proprietary information utility computing system as in claim 1 wherein the application services include at least one of the services listed below:

decision support software;

software for troubleshooting products;

system configuration services;

diagnostic services;

planning services;

selection services;

authoring tools that help authors generate appropriate software models;

learning services for data-mining and the ongoing evolution of models;

business intelligence services;

version management services;

presentation services;

brokering services;

stock selection services;

investment portfolio troubleshooting services;

investment portfolio selection services;

services to troubleshoot devices;

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medical diagnosis services;

services that predict failure and behavior;

purchasing decision services;

consulting services;

skills gap analysis services;

translation services for translating decision support models from one underlying technology to another;

enterprise resource planning services; and,

customer relationship management services.

5. A proprietary information utility computing system as in claim 1 wherein the first category of proprietary information contains health records and the application services include services to provide services for supporting healthcare and patients, without revealing private information.

6. A proprietary information utility computing system as in claim 1 wherein the second category of proprietary information includes proprietary information within at least one of the areas listed below:

decision support models; and

models associated with troubleshooting products.

7. A proprietary information utility computing system as in claim 1 wherein the second category of proprietary information includes decision support models utilizing at least one of the technologies listed below:

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Bayesian networks;
neural networks;
case-based systems;
model-based systems;
rule-based systems;
fuzzy systems;
decision trees;
genetic algorithms;
Monte Carlo Markov chains;
clustering algorithms;
Monte Carlo optimization;
simulated annealing;
pattern matching;
influence diagrams;
online analytical processing;
collaborative filtering;
linear programming;
machine learning; and,
time series.

8. A proprietary information utility computing system as in claim 1 wherein the interface allows users to connect to the proprietary information utility computing system using at least one of the following deployment channels:

wireless network;

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cellular phones;

internet sites;

applications embedded in appliances;

applications embedded in devices;

applications embedded in vehicle communication and information systems;

applications embedded in intelligent agents; and,

applications embedded in memory modules.

9. A proprietary information utility computing system as in claim 1 wherein the application services include services to support the creation, maintenance, and deployment of decision support models, in at least one of the following areas:

data-mining;

usage reports;

business intelligence reports;

adaptive learning and refining of models;

authoring wizards particular to specific horizontal and vertical industries; and,

quality benchmarks of models.

10. A proprietary information utility computing system as in claim 1 additionally comprising:

an application service registry that manages dynamic registration, access, use, and disposal of the application services.

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11. A proprietary information utility computing system as in claim 1 additionally comprising:

a proprietary information broker that maps semi-structured proprietary information requests to a most appropriate proprietary information model and application services that will operate on the most appropriate proprietary information model.

12. A proprietary information utility computing system as in claim 1 wherein the security system provides non-repudiation services in support of billing and reporting

13. A proprietary information utility computing system as in claim 1 wherein the security system provides privacy for all information transmitted outside of the proprietary information utility computing system, allowing proprietary services to make use of proprietary information utility computing system without revealing anything about users of the proprietary services and without revealing contents of data moving between services.

14. A proprietary information utility computing system as in claim 1 wherein the billing system provides revenue to be generated using at least one of the following pricing schemes:

pay-per-use micro-transactions;

vendor-visible service-based pricing;

hybrid flows;

subscription-based pricing; and,

price bundling.

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15. A proprietary information utility computing system as in claim 1 additionally comprising:

a scaleable computing engine that runs services across many pieces of information.

16. A proprietary information utility computing system as in claim 1 additionally comprising:

a computing engine, the computing engine being used to translate information from an author into a utility-native proprietary information format that can be used by at least a subset of application services within the proprietary information utility computing system.

17. A proprietary information utility computing system as in claim 1 wherein the billing system calculates royalty payments due to authors when proprietary information of the authors is used by the application services within the proprietary information utility computing system.

18. A proprietary information utility computing system as in claim 1 additionally comprising an application service registry that manages dynamic registration, access, use, and disposal of the application services, the application service registry providing a service catalog, a discovery mechanism, and a brokering interface that links with the proprietary information broker and the security system to provide a custom view of available application services, based on entitlement and visibility.

19. A method implemented by a computing system comprising the following steps:
providing outside entities connection to a proprietary information utility;

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storing proprietary information within a repository, wherein the repository is compartmentalized by user identity and entitlement so that a first category of proprietary information is within private domains available to only a single user and a second category of proprietary information is within domains to which multiple users may be granted use in response to acquiring a license to use particular proprietary information within the second category of proprietary information;

limiting access of each user connecting to the proprietary information utility to proprietary information to which each user is entitled, the proprietary information to which each user is entitled being accessed through use of application services operating within the proprietary information utility, wherein multiple users can be granted access to the same proprietary information; and

tracking usage of users of the proprietary information utility for billing purposes.

20. A method as in claim 19 additionally comprising the following:

managing dynamic registration, access, use, and disposal of the application services.

21. A method as in claim 19 additionally comprising the following:

mapping semi-structured proprietary information requests to a most appropriate proprietary information model and application services that will operate on the most appropriate proprietary information model.

22. A method as in claim 19 wherein limiting access of each user connecting to the proprietary information utility to proprietary information to which each user is entitled includes providing non-repudiation services in support of billing and reporting

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23. A method as in claim 19 wherein limiting access of each user connecting to the proprietary information utility to proprietary information to which each user is entitled includes providing privacy for all information transmitted outside of the proprietary information utility, allowing proprietary services to make use of proprietary information utility without revealing anything about users of the proprietary services and without revealing contents of data moving between services.

24. A method as in claim 19 wherein tracking usage of users of the proprietary information utility for billing purposes includes providing revenue to be generated using at least one of the following pricing schemes:

- pay-per-use micro-transactions;
- vendor-visible service-based pricing;
- hybrid flows;
- subscription-based pricing; and,
- price bundling.

25. A method as in claim 19 additionally comprising the following:

translating information from an author into a utility-native proprietary information format that can be used by a least a subset of application services within the proprietary information utility.

26. A method as in claim 25 wherein tracking usage of users of the proprietary information utility for billing purposes includes calculating royalty payments due to authors

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when proprietary information of the authors is used by the application services within the proprietary information utility.

27. A method as in claim 19 additionally comprising the following:

providing a service catalog, a discovery mechanism to provide a custom view of available application services, based on entitlement and visibility.

28 - 31. (Canceled)

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EVIDENCE APPENDIX

None

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RELATED PROCEEDINGS APPENDIX

None